

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

No: 1:23-cv-00108-LMB-JFA

**NON-PARTY THE INTERPUBLIC GROUP OF COMPANIES, INC.'S MOTION TO
SEAL**

Pursuant to Local Civil Rule 5(C) and the Court's Order of June 24, 2024 (ECF No. 871), non-party the Interpublic Group of Companies, Inc. ("IPG") respectfully moves this Court to seal portions of IPG documents designated as Confidential pursuant to the Protective Order (ECF No. 203) (PTX 1623 (Bates IPG-ADTECH_002361) and PTX 1654 (Bates IPG-ADTECH_000012)) and federal agency advertiser documents containing IPG's information (DTX 1176 (USPS-ADS-0000529112), DTX 1197 (USPS-ADS-0000529380), DTX 1222 (USPS-ADS-0000669680), DTX 1241(CMS-ADS-0000023248), DTX 1295 (USPS-ADS-0000899135), DTX 1296 (CMS-ADS-0000018746), DTX 1351 (USPS-ADS-0000623759), DTX 1452 (USPS-ADS-0000899149), DTX 1463 (USPS-ADS-0000902291), and Lim Exhibit F (UNDER SEAL) [excerpt of DTX 1547] (CMS-ADS-0001096610)) that Plaintiffs and Defendant in the above-referenced action have listed as trial exhibits.

Consistent with the local rules and this Court's Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on the parties and deliver a copy

to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is attached for the Court’s convenience.

Dated: July 26, 2024

Respectfully submitted,
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**[PROPOSED ORDER] GRANTING NON-PARTY THE INTERPUBLIC GROUP OF
COMPANIES, INC.'S MOTION TO SEAL**

Upon consideration of IPG's motion to seal portions of trial exhibits parties have identified (Attachments A-L) and pursuant to Local Civil Rule 5, the Court hereby FINDS that the motion for sealing should be granted because the withheld documents and information were marked as Confidential by IPG, contain sensitive commercial information of IPG and / or contain personal information of IPG employees, and IPG has proposed narrowly tailored redactions.

Accordingly, for good cause shown, it is hereby ORDERED that IPG's motion to seal portions of Attachments A-L is GRANTED; and it is further ORDERED that only IPG's proposed redacted versions of these documents shall be publicly disclosed at trial.

IT IS SO ORDERED.

ENTERED this ____ day of _____ 2024.

Alexandria, Virginia _____ DATE: _____
Honorable John F. Anderson
United States Magistrate Judge